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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

CAROLINE BARKER,

Plaintiff,

v.

LAUREN MCFERRAN, Chairman, National
 Labor Relations Board,

Defendant.

CASE NO. 4:23-cv-308-DMR

**STIPULATION AND ORDER RE: SCHEDULE
 FOR DEFENDANT'S MOTION TO DISMISS
 PLAINTIFF'S AMENDED COMPLAINT**

The Honorable Donna M. Ryu

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff and Defendant hereby stipulate and respectfully request the Court to grant the parties' proposed schedule for Defendant's motion to dismiss Plaintiff's amended complaint. After Defendant's counsel notified Plaintiff that Defendant intends to file a motion to dismiss Plaintiff's amended complaint, Plaintiff requested additional time to prepare her response. Accordingly, the parties conferred and agree that the Court should grant the parties' request for the following schedule:

1. Defendant will file her motion to dismiss Plaintiff's amended complaint by March 4, 2024.
2. Plaintiff will file her opposition to Defendant's motion by April 3, 2024.
3. Defendant will file her reply in support of the motion by April 19, 2024.
4. Defendant will notice the hearing on her motion to dismiss for May 9, 2024, at 1:00 p.m.

The parties respectfully request that the Court grant their stipulation.

DATED: February 9, 2024

Respectfully submitted,¹

ISMAIL J. RAMSEY
United States Attorney

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendant

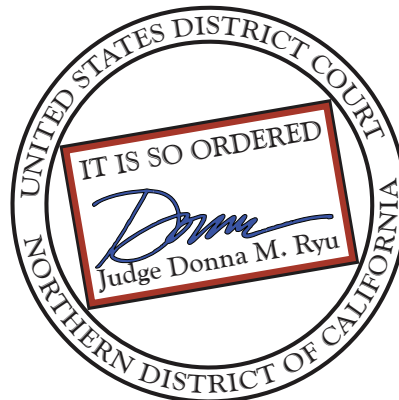
DATED: February 9, 2024

s/ Caroline Barker
CAROLINE BARKER
Plaintiff, *pro se*

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED: February 12, 2024



HON. DONNA M. RYU
United States Chief Magistrate Judge

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On February 7, 2024, the Court granted Defendant's administrative motion for an additional extension of time for Defendant's response to Plaintiff's amended complaint. *See* Dkt. No. 53.

3. Following the Court's Order granting additional time, I discussed with Plaintiff Defendant's intention to file a motion to dismiss Plaintiff's amended complaint. Plaintiff agreed to stipulate to a proposed briefing and hearing schedule for Defendant's motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: February 9, 2024

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney